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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAY 18 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Requests for Waiver of LMDS) CC Docket 92-297
Eligibility Restrictions and USTA Letter)
)

To: Chief, Auctions & Industry Analysis Division -
Wireless Telecommunications Bureau

**COMMENTS OF THE
SOUTH CAROLINA CABLE TELEVISION ASSOCIATION**

The South Carolina Cable Television Association ("SCCTA")¹ by its counsel and pursuant to FCC Public Notice DA 98-731 (released April 16, 1998) (the "Notice"), hereby submits these Comments regarding certain incumbent LEC/LMDS eligibility waiver requests that have been filed with the Commission.

¹ The SCCTA is the trade association for South Carolina cable television industry. SCCTA's members include cable operators providing cable television and other telecommunications services to more than 750,000 subscribers on 150 cable systems in South Carolina. The SCCTA has participated in regulatory proceedings before this Commission and the South Carolina Public Service Commission on telecommunications and related issues. Because the SCCTA's membership was and is impacted by the FCC's LMDS eligibility restrictions, SCCTA has a substantial interest in the Commission's decisions regarding the LMDS waiver requests in this proceeding.

I. BACKGROUND

The procedural history of the FCC's LMDS rulemaking that led to the 1998 LMDS auction is a long and contested one. Similarly, the in-region incumbent local exchange carrier ("ILEC") and cable/LMDS eligibility restrictions ultimately adopted in the LMDS proceeding were also the subject of considerable challenge and debate.² While the FCC's LMDS rulemaking began in late 1992, specific proposals to impose any type of industry-specific eligibility restrictions were not raised until the Commission's *Third Notice of Proposed Rule Making* in this docket, which was released in July 1995.³ Further, the more specific ILEC-cable/LMDS eligibility restriction was first raised in the *Fourth Notice of Proposed Rulemaking* in this docket.⁴

² Pursuant to 47 C.F.R. § 101.1003, ILECs and cable operators may only hold LMDS A Block (1,150 MHz) licenses in BTAs where they provide local exchange or cable service if they serve less than 10% of the population of the BTA. If an ILEC or cable operator bids on and obtains an in-region A Block license, and it serves more than 10% of the BTA's population, then it must divest or partition or, for good cause, obtain a waiver of the restrictions after licensing. ILECs and cable operators serving a BTA may bid on any of the smaller B Blocks (150 MHz) in the BTA.

³ See *Rulemaking to Amend Parts 1, 2, 21 and 25 of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services*, CC Docket 92-297, *Third Notice of Proposed Rulemaking and Supplemental Tentative Decision*, 11 FCC Rcd 53 (1995) ("Third NPRM").

⁴ See *Rulemaking to Amend Parts 1, 2, 21 and 25 of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services*, CC Docket 92-297, *First Report and Order and Fourth Notice of Proposed Rulemaking*, 11 FCC Rcd 19005 (1996) ("Fourth NPRM").

From the issuance of the *Third NPRM* on, both the local telephone and cable industries actively opposed the imposition of any in-region eligibility or cross-ownership restrictions. Furthermore, both industries participated in FCC and judicial challenges to the eligibility restrictions that ultimately were adopted in the *Fifth Notice of Proposed Rulemaking*.⁵ However, as noted above, both the FCC⁶ and the federal appeals court⁷ rejected all challenges to the eligibility restrictions, prior to the start of the auction. Given these restrictions, there was no wide-spread cable participation in the LMDS auction, although certain LECs participated, outbid others seeking LMDS licenses, and are now asking the Commission to waive the ILEC eligibility restrictions after the fact. None of the waivers under consideration in this proceeding were submitted by cable operators.

⁵ See *Rulemaking to Amend Parts 1, 2, 21 and 25 of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services, et al.*, CC Docket 92-297, *Second Report and Order, Order on Reconsideration, and Fifth Notice of Proposed Rulemaking*, 12 FCC Rcd 12545 (1997) ("Fifth NPRM"); see also *Melcher v. FCC*, 134 F.3d 1143 (D.C.Cir. 1998).

⁶ *Rulemaking to Amend Parts 1, 2, 21 and 25 of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services, et al.*, CC Docket 92-297, *Third Order on Reconsideration*, FCC 98-15, released February 11, 1998 ("Third Reconsideration Order").

⁷ In *Melcher*, the Court rejected all challenges to the ILEC/LMDS eligibility restriction, and found that the FCC's restrictions were reasonable and consistent with the Telecommunications Act of 1996. 134 F.3d at 1146.

II. THE COMMISSION SHOULD DENY ALL ILEC LMDS ELIGIBILITY WAIVER REQUESTS

SCCTA strongly opposes the grant of *any* of the subject ILEC/LMDS waiver requests, and in particular, the requests of Farmers Telephone Cooperative, Inc. ("FTC")⁸ and Horry Telephone Cooperative, Inc. ("HTC")⁹. SCCTA opposes these requests on two basic grounds. First and foremost, as a matter of policy, it would be tremendously unfair to grant eligibility waivers, after the auction has ended, only to those entities that knowingly ignored the FCC's LMDS eligibility restrictions by bidding on restricted markets. These bidders are simply trying to get a "second bite at the apple" with an end-run of the eligibility restrictions by filing a waiver request. As explained above, the cable industry in general was very interested in LMDS technology, and actively participated in the LMDS rulemaking process, specifically commenting that it opposed any in-region eligibility restrictions.¹⁰ However, due to the FCC's and the court's consistent rulings upholding the restrictions,¹¹ cable operators by and large did not even file short form applications to participate in the LMDS auction.

SCCTA is sympathetic to the fact that the LMDS short form application filing deadline of January 20, 1998, preceded the decision in *Melcher*, and that certain ILECs may have wanted to preserve their options with regard to participating in the auction in the event a favorable ruling on the eligibility issue was received. However, the *Melcher* decision was

⁸ See FCC File No. 0000000102 - FCC Form 601 - Summer, SC BTA - Block A.

⁹ See FCC File No. 0000000094 - FCC Form 601- Myrtle Beach, SC BTA - Block A.

¹⁰ See, e.g., National Cable Television Association Comments to *Fourth NPRM*. The cable industry argued that all eligibility restrictions should be eliminated, cable and ILEC alike.

¹¹ See footnotes 6 and 7, *supra*.

released on February 6, 1998, prior to the start of the auction on February 18, 1998.

Consequently, all ILECs and cable operators were on notice prior to the LMDS auction start that they would not be able to acquire and retain in-region Block A LMDS licenses. LMDS auction participants that proceeded in bidding for and acquiring restricted Block A licenses did so at their own risk, and subject to the FCC's divestiture requirements.¹² It would be patently inequitable for the Commission to retroactively make preferential exceptions to the rule now for the ILECs seeking waivers in this proceeding.

Second, and more specifically, SCCTA opposes the waiver requests of both FTC and HTC, as they will not further any competitive objective favored by the Commission. The Commission adopted the ILEC-cable/LMDS in-region eligibility restriction purportedly "to help assure that competition in the LEC and MVPD markets is enhanced with the licensing of LMDS."¹³ While the Commission simultaneously adopted both divestiture and waiver procedures, the Commission did not envision the filing of waiver requests *prior to* initial LMDS licensing. Rather, the Commission stated that it would review waiver petitions filed after initial licensing but prior to the expiration of the three year eligibility restriction period, when the proposed ILEC or cable LMDS licensee is able to show "that the actual conditions in a particular market are sufficiently competitive and rivalrous so that the restriction is no longer necessary to promote competition in the telecommunications marketplace."¹⁴

¹² See 47 C.F.R. § 101.1003(f).

¹³ *Fifth NPRM* at ¶ 193.

¹⁴ *Fifth NPRM* at ¶ 199.

Not only are both the Farmers or HTC waiver requests premature, but neither waiver request presents the type of competitive market conditions that the Commission envisioned when it stated that it may consider waiver requests of its LMDS eligibility restrictions. With regard to HTC's application, SCCTA first observes that HTC has 50,000 telephone subscribers and serves Horry County and Georgetown County, SC. However, it also appears that the majority of HTC's subscribers are located in Horry County as eight out of the eleven identified communities served are located in Horry County, and five out of six of HTC's business offices are located in Horry County.¹⁵ According to the 1998 *Rand McNally Commercial Atlas and Marketing Guide*, BTA 312 - Myrtle Beach is comprised of only Horry County, which had a 1997 population of approximately 167,000.¹⁶ Because the number of telephone subscribers should be multiplied by a factor of at least 2 or 3, and because it appears that the majority of HTC's subscribers are located in Horry County, it logically follows that considerably more than ten percent of the population of BTA 312 is served by HTC. Because HTC does not specify what the percentage overlap is, the Commission must require HTC to provide the precise overlap before considering any aspect of HTC's waiver request.

Moreover, from HTC's website it is clear that it not only provides standard LEC service, but internet access, cable service (more than 20,000 subscribers), long distance, cellular/wireless service, and a specialized switched broadband service. Since HTC already

¹⁵ Horry's home page on the internet contains substantial information on its operations and services. See <http://www.sccoast.net/horry> (attached as Exhibit 1).

¹⁶ See 1998 *Rand McNally Commercial Atlas & Marketing Guide* at p.42.

provides virtually every type of service that could be provided by LMDS, it appears that HTC, which engaged in spirited bidding for both the Block A and B licenses in BTA 312, is not really in desperate need of 1,300 MHz of spectrum to provide "additional services" to its subscribers.

The situation is no better for FTC either. According to its website, FTC is the third largest telephone cooperative in the United States, providing "state-of-the-art services and equipment to its 50,000+ members". Its service area covers approximately 3,000 square miles in Williamsburg, Lee, Sumter, Clarendon and Florence Counties.¹⁷ BTA 436 - Sumter is also comprised of Lee, Sumter and Clarendon Counties. The 1997 population for the Sumter BTA was approximately 156,400.¹⁸ FTC has business offices in all three counties within BTA 436, including Sumter, the most populous city within the BTA. Because FTC's waiver request also did not provide any information about the size of its authorized telephone service area, it is impossible to independently determine the precise overlap percentage. However, given the information that is available, it appears once again that the likely overlap percentage is much more than the "minimal" overlap described by FTC.

Finally, SCCTA also notes that like HTC, FTC also provides numerous telecommunications services, such as data, long distance, internet access and wireless services, in addition to local telephone service. Consequently, it is difficult to elicit FTC's pressing competitive need for 1,150 MHz of spectrum to fulfill unmet service demands.

¹⁷ See Print-outs from FTC's website @ <http://www.ftc-i.net> (attached as Exhibit 2).

¹⁸ See 1998 *Rand McNally Commercial Atlas & Marketing Guide* at p.43.

III. CONCLUSION

The Commission should *not* retroactively eliminate the restriction for those ILECs that bid in the initial auction with full knowledge of the existing eligibility restrictions. There is "no good cause" to provide these ILECs with preferential treatment and thus waive the restriction for one set of obstinate bidders who bid with full knowledge of the restrictions. They are simply gambling that the Commission will favor them and bail them out.

Respectfully submitted,

**SOUTH CAROLINA CABLE
TELEVISION ASSOCIATION**

By: 

John D. Seiver
Theresa A. Zetterberg
Its Attorneys

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1919 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006

May 18, 1998

EXHIBIT 1

**HORRY TELEPHONE COOPERATIVE
WEBSITE PRINTOUTS**



outh Carolina information High

... South Carolina's front door™

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MindSpring

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Horry Telephone Cooperative - Internet access

Location

City: Conway
County: Horry

E-mail:

Auto-answer: htc@sccoast.net
Person: cory@sccoast.net

Telephone

Sales: 803-365-2151
Support: 803-365-2155

Web URL: <http://www.sccoast.net>

Communities served

Services offered

PPP, dedicated dial-up, Frame Relay, 56K, T1, Web hosting,
Web development

South Carolina communities served by Horry Telephone Cooperative

Andrews
Conway
Garden City

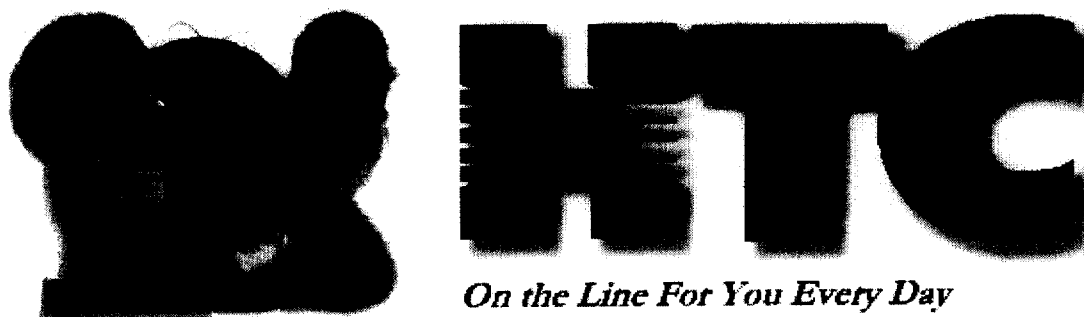
Georgetown
Green Sea
Little River

Loris
Myrtle Beach
North Myrtle Beach

Pawleys Island
Surfside

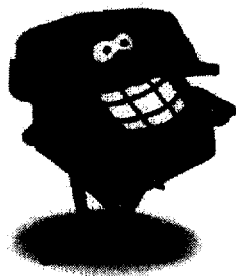
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Retail Centers
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Caller ID
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Customer Originated Trace
Automatic Call Return
Automatic Busy Redial
Selective Ringing/Call Waiting
Selective Call Forwarding
Selective Call Acceptance
Selective Call Block

Business
Chat
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News/Weather
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Give Your Phone The AddedTouch



Here Are Four Of Our Most Popular Packages

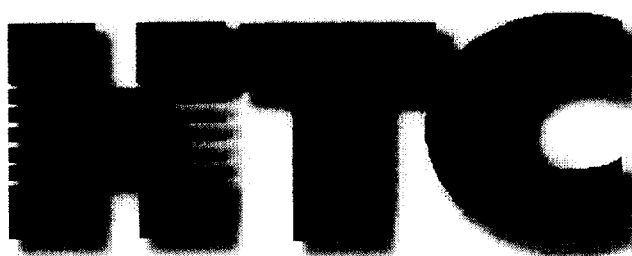
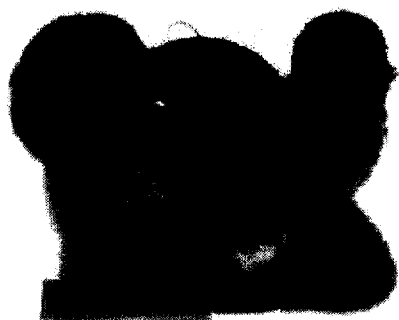
Package #1
Help Line & Call Waiting

Package #2
Call Waiting & Personal Ringing

Package #3
Call Forwarding, Call Waiting,
Three-Way Calling &
Speed Calling-8

Package #4
Call Forwarding, Call Waiting &
Personal Ringing

Horry Telephone Cooperative, Inc. (HTC) is a communications company providing a full spectrum of customized services for business and residential use . . . Local Telephone Services & Features, Business Systems, Cable Television, Long Distance, Internet, Wireless, Data, Broadband and more.



On the Line For You Every Day

The Sega Channel | Digital Music Express

Telephone Systems

Business Systems

Cablevision

Long Distance

Internet

Retail Centers

Wireless/Mobile

Business

Chat

Education

Entertainment

For Kids

News/Weather

Sports

Travel

Rate Schedule

Basic Cable

15 Channels - \$10.00

Cable Plus

33 Channels - \$12.50

(must subscribe to Basic Cable to get Cable Plus)

Total Package

48 Channels - \$22.50

(excluding Premium Channels)

INDIVIDUAL CHARGES

Premium Channels: (converter box required)

Home Box Office (HBO) - \$9.50/month

Showtime - \$9.50/month

The Movie Channel - \$9.50/month

FLIX - \$3.95/month

(discounts available for multiple premiums)

MOVIE PACK

Showtime, The Movie Channel and FLIX - \$12.95/month

PAY-PER-VIEW

(converter box required)

Movies - \$3.95/each

Events - Prices Vary

Converter Box Rental w/ remote control - \$2.50/month

The Sega Channel - \$12.95/month

(one time activation fee of \$25.00)

Digital Music Express - \$9.95/month

Fees/Taxes

County Franchise Fee - 1%

State Sales Tax - 5%

(Prices exclude county franchise fee and SC sales tax)

Horry Telephone Cooperative, Inc. (HTC) is a communications company providing a full spectrum of customized services for business and residential use . . . Local Telephone Services & Features, Business Systems, Cable Television, Long Distance, Internet, Wireless, Data, Broadband and more.

Telephone Systems

Business Systems

Cablevision

Long Distance

Internet

Retail Centers

Wireless/Mobile

Business

Chat

Education

Entertainment

For Kids

News/Weather

Sports

Travel

Horry Telephone Long Distance

| ["Flat Rate Savings Plan"](#) | [30-20-10 Plan](#) | [Express800](#) |

HTLD Flat Rate Savings Plan

It's as easy to understand as it is to afford.

Leave it to the folks at Horry Telephone Long Distance to come through once again with a new long distance savings plan that delivers easy-to-understand low rates for long distance service.

It's called the HTLD Residential Flat Rate Savings Plan. And the bottom line is you can call anywhere in the United States for as little as 10 cents a minute weeknights and weekends, and 24 cents a minute weekdays.

It's really that simple. There are no sign-up fees, no surcharges, no monthly flat rate fees, and no hidden charges. And you'll receive just one bill for your long distance calls. All you have to do is complete the [sign-up form](#) - or speak with an HTLD customer service representative.

The plan goes anywhere you do.

Once you choose the HTLD Residential Flat Rate Savings Plan, you'll be entitled to receive a free calling-card. It's the convenient way to call and save - even when you're away from home. From any phone, on any equipment, at any location, you can call anywhere in the US for a low flat rate of 24 cents a minute with no surcharge.

You'll be doing business with the company you own.

You can be a member-owner of one of the largest communications companies of its kind in the nation, no matter who is your local telephone carrier. If we all work together, we can continue to offer the best communications services at the lowest possible price.

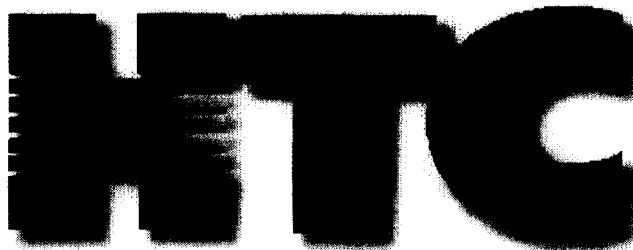
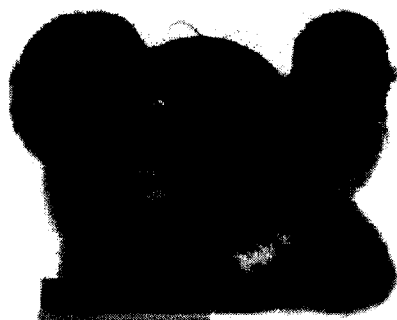
So what are you waiting for?

You'll receive low long distance rates, a free calling card, and one convenient bill - all from a local and innovative company.

To sign up, fill in the [web-based form](#) or call 365-2154. Ask us about our *Express800* service, too.

There's also a great [tiered pricing-plan](#) for those who make a very large amount of calls during the day.

Horry Telephone Cooperative, Inc. (HTC) is a communications company providing a full spectrum of customized services for business and residential use . . . Local Telephone Services & Features, Business Systems, Cable Television, Long Distance, Internet, Wireless, Data, Broadband and more.



On the Line For You Every Day

HTC Internet Services Department
365-SURF
htc@sccoast.net

Change your password

Telephone Systems

Business Systems

Cablevision

Long Distance

Internet

Retail Centers

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Business

Chat

Education

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For Kids

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Get on the Fast Track:

As a local, member-owned, not-for-profit organization, HTC is committed to the interests of our community. With very competitive monthly rates, an unbeatable start-up plan, and protective software programs like Surfwatch available, we make it easier than ever to get on the information Superhighway. We are also available everywhere in Horry and Georgetown counties.

Browsing the Web is a Breeze:

HTC offers Netscape Navigator 3.0 free upon sign-up for advanced browsing capabilities. Navigator offers numerous features, including Audio, Video, and 3D. The browser also features advanced security, Java support, and advanced layout capabilities.

Pricing Plans:

Residential Unlimited	\$24.95/month
w/HTLD	\$19.95/month
Corporate Account	\$100/month for 250 hours
Extra Email Box	\$2/month
Commercial Web Sites	See Web Tel Pro
Free Personal Webspace	www.sccoast.net/horry/freeweb.html

Technical Support:

1-888-781-2006

Mon-Fri - 9AM until 9PM

Sat, Sun - 1PM until 9PM

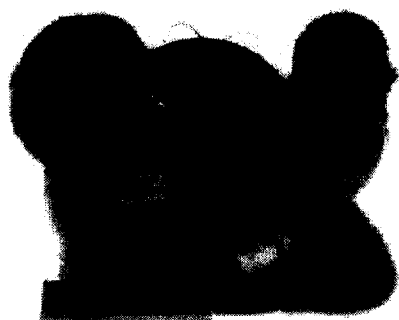
Technical Support Web Site: <http://support.infoave.net>

Local Access Numbers:

Note that calling a number other than the one specific to your local calling area will be a measured call.

Customer Exchange	Access Number
358,347,397,399,349,248,381,959,365	365-4638
264,527,546,237,221,520	904-0005
249, 272, 280, 361, 451, 238, 444, 448, 449, 450, 497, 626, 692, 828, 916, 946, 913, 997, 215, 357, 651, 650, 293, 236	913-7510
756,464,526,649,392	392-4638

Horry Telephone Cooperative, Inc. (HTC) is a communications company providing a full spectrum of customized services for business and residential use . . . Local Telephone Services & Features. Business Systems. Cable Television. Long Distance. Internet. Wireless. Data. Broadband and more.



HTC

On the Line For You Every Day

Telephone Systems

Business Systems

Cablevision

Long Distance

Internet

Retail Centers

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Business

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Education

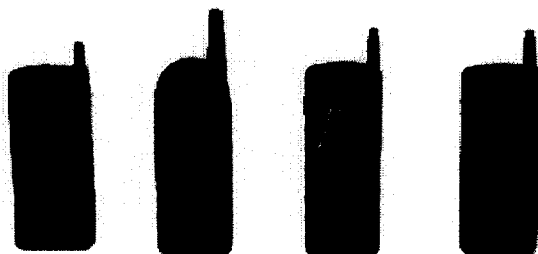
Entertainment

For Kids

News/Weather

Sports

Travel

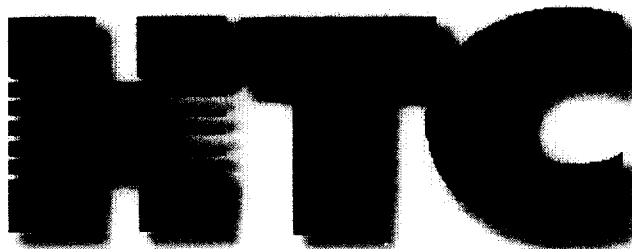
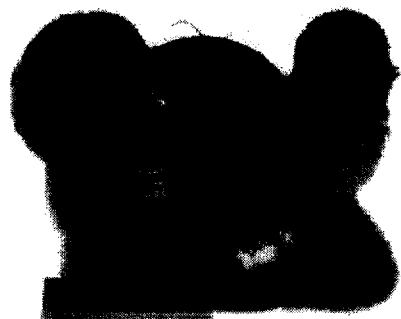


HTC Horizon

Through a partnership with BellSouth Mobility and 30 other independent companies, HTC is now offering HTC Horizon, an all digital wireless communication system. HTC Horizon is the latest in mobile communications and surpasses traditional cellular telephones in quality, features, and security. This technology allows the telephone to easily handle data transmissions from laptop and hand-held computers. Users can even view email or receive a fax via a screen on the phone.

Calling Plan	Monthly Service	Minutes Included Per Month	Additional Airtime Charge Per Minute
Leisure Plan	\$14.95	0	0.45/minute weekday 0.05/minute weekend
Personal Plan	\$27.95	30	0.30
Performance Plan	\$69.95	180	0.25
Power Plan	\$109.95	360	0.20

Calling Area



On the Line For You Every Day

Telephone Systems

Business Systems

Cablevision

Long Distance

Internet

Retail Centers

Wireless/Mobile

Business

Chat

Education

Entertainment

For Kids

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Horry Telephone Business Office Locations

Conway	Little River	Loris	Murrells Inlet	Socastee
3480 Hwy. 701 North	3383 Hwy. 9 Waterway Plaza	4350 Main Street	3663 Hwy. 17 Business	6009 Hwy 707
365-2154	399-7600	756-7600	651-2111	650-2199

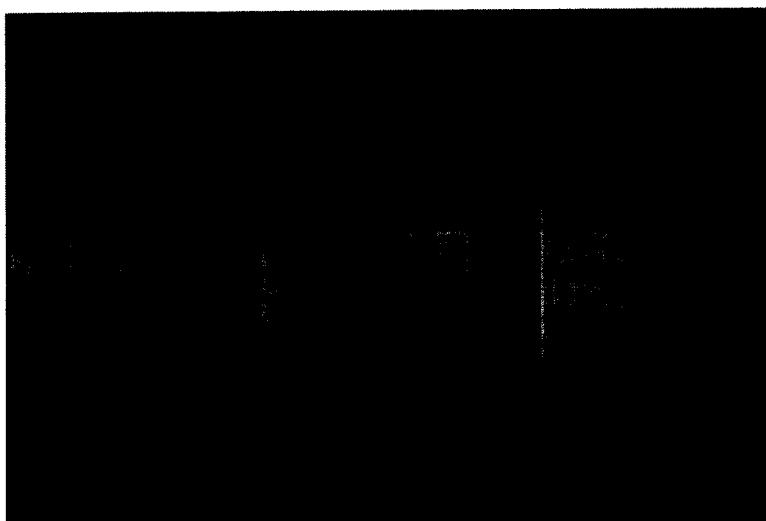
The **HTC Horizon** Office is located at
2501 North Kings Hwy in Myrtle Beach
996-4482

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EXHIBIT 2

**FARMERS TELEPHONE COOPERATIVE
WEBSITE PRINTOUTS**

Welcome to...



Farmers Telephone Cooperative, Inc

Corporate Headquarters - Kingstree, SC



You Are Visitor Number:

169948

Last Updated on May 05, 1998

This web site requires a browser that supports FRAMES.

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Farmers Telephone Cooperative - Internet access

Location

City: Kingstree

County: Williamsburg

E-mail: haddockr@ftc.org

Web URL: www.ftc-i.net

Telephone

Sales: 803-382-1299

Support: 800-541-5030

Communities served

Services offered

Shell accounts, PPP, dedicated dial-up, ISDN, Frame Relay, 56K, T1

Web hosting

South Carolina communities served by Farmers Telephone Cooperative

Andrews
Bishopville

Kingstree
Manning

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Sumter

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The GREAT CONNECTION !



Farmers Telephone Cooperative, Inc.



Farmers Telephone Cooperative is the 3rd largest telephone cooperative in the United States. Its Business is Telecommunications. Its Objective is to provide state-of-the-art services and equipment to its 50,000+ members at the most economical means possible. FTC has maintained its pioneer spirit throughout its 47 years of existence by fostering proactive work principles. This innovative management concept, tempered by sound business practices, has catapulted the Cooperative's growth and respect throughout the nation. Its service area covers approximately 3,000 square miles including parts of Williamsburg, Lee, Sumter, Clarendon and Florence Counties.

Mission Statement



It is the mission of Farmers Telephone Cooperative to provide the most advanced broad array of communication services available at affordable prices.

These services will incorporate personnel, equipment, computer support and engineering to efficiently and expediently migrate to a broadband network facility throughout the service territory. All services will be directed to the benefit of the subscriber.

Modern technology will be utilized to allow the Cooperative to grow with future opportunities. The Cooperative will aggressively seek new services and opportunities tempered with sound engineering and business principles. Farmers Telephone Cooperative will aspire to be the very best through leadership, integrity, teamwork, perseverance, and sound judgement.



Call or visit one of our convenient locations. We will be happy to assist you with all of your telecommunications needs!

Kingtree, South Carolina

Corporate Headquarters & Kingtree District Operations
Customer Service

1101 E. Main Street

(843) 382-2333
(843) 382-1387

Sumter, South Carolina

Sumter District Headquarters
North Sumter Customer Service
Shaw Customer Service

631 North Pike West

(803) 469-2525
(803) 469-5224
(803) 469-5264

Bishopville, South Carolina

Customer Service

203 Gregg Street

(803) 428-6296

Lake City, South Carolina

Customer Service

219 West Main Street

(843) 389-2759

Manning, South Carolina

Customer Service

Highway 261

(803) 473-3300



Farmers Telephone Cooperative was established in 1951. It was formed to provide a communications system to connect rural eastern South Carolina residents to their urban and industrialized neighbors. The first system consisted of a crank type switchboard serving 52 homes. From this humble beginning, it has bounded into the nineties as a 17 exchange organization serving over 50,000 members.



In the realm of community affairs, Farmers Telephone Cooperative has built a towering legacy. The Cooperative enhances the quality of living for its customers at every opportunity. Its image projects leadership in all areas of community life - from civic clubs to chambers of commerce. The Cooperative has given free internet access to over 75 schools in its territory and provides financial scholarships at three state universities.



Farmers Telephone Cooperative is committed to quality economic growth for all of its territory. Evidence of its support is visible in the following:

- Clarendon County Industrial Park
- Partnership with Black River Cooperative for Spec Building in Sumter County
- Partnership with Santee Electric Cooperative for Projected Williamsburg County Industrial Park

FTC

Your *home town* telecommunications company --- the company that prides itself in the *personal* service it provides for its customers!



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Data Communications

Business Solutions

Farmers Long Distance

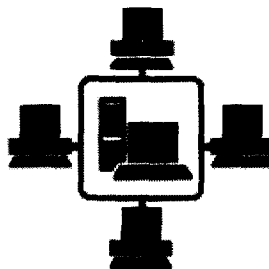
FTC Wireless

FTC-I.Net

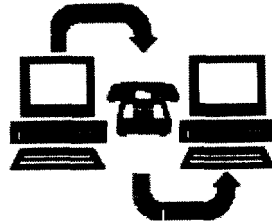
TelePlus - Custom Calling Features



From the largest mainframe to the smallest notebook, Farmers Telephone Cooperative is able to meet your data networking needs. Whether you need to connect offices across town or across the country, we can offer you the latest technologies available in the Telecommunications industry today.



We also provide services that allow the mobile or "at home" employee to exchange data with your traditional internal network. This can be accomplished through a private network or through a public network such as the Internet. As an Internet Access Provider, we can bundle Internet access with any Data Communications Solution.



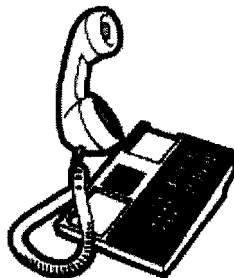
The Internet is being used more and more by businesses as a medium by which to transfer electronic data between employees, locations, vendors, and customers. Realizing this, we have made investments in technologies to provide the very best that the Internet has to offer. To learn more about FTC's Internet services visit our [FTC-I.Net Page](#) and our [Links Page](#).

Technologies that we offer now or will offer in the near future range from the traditional privately owned, dedicated Digital Circuits (DS-1, 56/64K, 19.2K, and etc.) to the next generation, Switched Public Data Networks. The switched network technologies that we provide are ISDN (Integrated Switched Digital Network), Frame-Relay, and ATM (Asynchronous Transfer Mode). We also provide Internet and WAN consultation to help you chose the right technology to meet you information needs. If you would like more information on our Data Communication Services please call one of our [local offices](#) or e-mail ftc_cs@ftc-i.net.



Farmers Telephone Cooperative, Inc. offers a variety of telephony solutions for your business needs. We provide the latest in digital technology with business systems. Our service is provided by trained certified technicians who live and work in your community. The FTC technicians are available 24 hours a day, seven days a week.

We have Communication Consultants ready to help you design and implement a telephony solution to suit your particular needs. Whether you are a small privately owned business, a business with separate locations, or a large industry with complex telephone service requirements, FTC can help build your telecommunications infrastructure.



We install digital systems that offer a wide selection of the industry's latest features at every station. The hybrid system that we sell consist of the Comdial family of products. The Comdial DXP Plus, DSU, and DSU II are the systems that we provide. Conference Calling, Caller ID Integration, Account Codes, Call by Name, System Speed Dial, and Industry Standard Telephone support are just a few of the many features provided. The DXP Plus supports other outstanding features such as T1 Interface, Direct Inward Dial, and Computer Telephony Integration (CTI) applications. All three Comdial cabinets come standard with a two year lightning warranty. The Comdial Voice Mail system starts as a 2-Port 25 hour configuration and will expand to 16-ports. The Comdial Voice Mail is an integrated system that provides auto attendant, routing boxes, and message notification. With software enhancements, this system will provide features such as